

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

EDGEWOOD HIGH SCHOOL OF THE
SACRED HEART, INC.,

Plaintiff,

v.

Case No.: 3:21-cv-00118-wmc

CITY OF MADISON, WISCONSIN, *et al.*

Defendants.

**PLAINTIFF’S REPLY IN SUPPORT OF OBJECTIONS TO
DEFENDANTS’ BILL OF COSTS**

Plaintiff Edgewood High School of the Sacred Heart, Inc. (“EHS”), stands on its objections and declines further reply except to note that the City’s selective recitation of Mr. Elliott’s testimony. Mr. Elliott testified that “I will always have a home, I think, in Dane County.” (Elliott Dep. at 18:14-19.) Before or after deposition, the City had no reason to believe that Mr. Elliott would become unavailable after his retirement from the President’s role at EHS.

In the event the Court denies the Plaintiff’s objections and EHS subsequently prevails after appeal, the City should be deemed to have waived similar such objections to EHS’s Bill of Costs.

Dated: February 6, 2023

Respectfully submitted,

GODFREY & KAHN, S.C.

s/Jonathan R. Ingrisano

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